

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS, CO., LTD.  
AND SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendants.

Case Nos. 6:21-cv-00210-ADA

**JURY TRIAL DEMANDED**

**[REDACTED]**

**DECLARATION OF JASON WILLIAMS IN SUPPORT OF SAMSUNG'S  
MOTION TO STRIKE DR. RUBIN'S SUPPLEMENTAL EXPERT REPORT**

I, Jason Williams, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts in this declaration and, if called upon to do so, could and would testify competently as to the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the supplemental expert report of Dr. Aviel David Rubin, dated December 20, 2022 (highlighted for the Court's convenience).

3. Attached hereto as Exhibit 2 is a true and correct copy of the parties' correspondence September 16, 2022 regarding Samsung's source code.

4. Attached hereto as Exhibit 3 is Proxense's Amended Final Infringement Contentions, served on March 7, 2022 (highlighted for the Court's convenience).

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition of Allen Kim, taken on August 4, 2022 (highlighted for the Court's convenience).

6. Attached hereto as Exhibit 5 is a true and correct copy of page 24 of the Samsung Pay Developers Onboarding and Project Integration Guide, which was produced as SAMSUNG\_Proxense\_254536.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of Exhibit A of Proxense's Preliminary Infringement Contentions, served on July 1, 2021 (highlighted for the Court's convenience).

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
December 23, 2022 at New York.

/s/ **Jason Williams**

Jason Williams